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August 15, 1997

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Regina Keeney, Esq.  
Chief, Common Carrier Bureau  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

Dear Ms. Keeney:

Re: DA No. 97-1628, CC Docket No. 96-61, Implementation  
of Section 254(g) of the Communications Act of 1934, as  
amended

Sprint Communications Company, L.P. ("Sprint") responds to the Bureau's July 30, 1997 Order<sup>1</sup> in the above-captioned proceeding requiring Sprint to submit a plan to implement rate integration by September 1, 1997, for interstate, interexchange services provided between Guam and the Commonwealth of Northern Marianas (CNMI), and for similar services provided between Puerto Rico and the U.S. Virgin Islands, and other U.S. points. The Order required Sprint's plan to include proposed rates for rate integrated calls between the aforementioned points and to integrate these rates on or before September 1, 1997.

For calls between Guam and the CNMI, Sprint will, so long as it originates service from Guam,<sup>2</sup> charge the integrated rates for its Dial 1 service in its Tariff F.C.C. No. 10. Depending on the precise mileage between Saipan, Tinian, Rota, the principal populated islands of the CNMI, and Guam, the rates would be \$0.27 or \$0.28 per minute during peak hours of 8:00 A.M.-5:00 P.M. local time, \$0.17 per minute during the evening hours of 5:00 P.M.-11:00 P.M., and \$0.15

<sup>1</sup> Policy and Rules Concerning the Interstate, Interexchange Marketplace, DA No. 97-1628, released July 30, 1997 ("Order").

<sup>2</sup> Consistent with its earlier submissions to the Commission in this matter, Sprint notes that with the exception of a few card products, it does not originate service from the CNMI.

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per minute during nights (11:00 P.M.-8:00 A.M.) and weekends (Saturdays and Sundays until 5:00 P.M.). These rates are identical to those in Sprint's Tariff F.C.C. No. 1 for its Dial 1 product. It will also, so long as it originates service from Guam, offer its Sprint Sense product under a unified interstate tariff as well. Other interstate service will be offered under a unified tariff as well so long as Sprint originates service from Guam.<sup>3</sup>

Sprint will also integrate its rates between Puerto Rico and the rest of the U.S. as well as between the U.S. Virgin Islands and the rest of the U.S. It will accomplish this by charging the same rates for interstate interexchange services it offers in Puerto Rico and the U.S. Virgin Islands as it does in the rest of the U.S. Thus, for example, Sprint's interstate Dial 1 offering originating in either Puerto Rico or the U.S. Virgin Islands will be available under the unified Dial 1 interstate rate schedule. Similarly, Sprint Sense interstate service will be made available under a unified interstate rate schedule.

Should you have any questions, please do not hesitate to contact the undersigned.

Very truly yours,



Kent Y. Nakamura  
General Attorney

cc: Patrick Donovan, Esq.  
Neil Fried, Esq.  
Guam/CNMI Working Group

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<sup>3</sup> Sprint notes that there are some services, such as Frame Relay and very high speed private line offerings, for which there is likely to be no demand between Guam and CNMI because of the small population on those islands. Although Sprint will, consistent with its understanding of the Bureau's Order, provide such offerings at integrated rates upon request, it would like to do so only after receiving a bona fide request for such service. Modifying all the tariffs for Sprint's existing interstate services would require significant administrative effort and expense which Sprint would prefer to avoid until there is an actual request for the service in question. If this approach presents problems for the Commission, Sprint would appreciate knowing this as quickly as possible.

### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing **LETTER** of Sprint Communications Company L.P. was sent by hand or by United States first-class mail, postage prepaid, on this the 15<sup>th</sup> day of August, 1997 to the below-listed parties:

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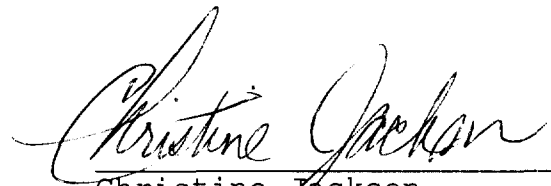
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August 15, 1997